

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

JAMES GORDON MEEK,

Defendant.

Case No. 1:23-MJ-32

**CONSENT MOTION TO EXTEND TIME FOR INDICTMENT**

The United States of America, by and through its Zoe Bedell, Assistant United States Attorney, and Whitney Kramer, Special Assistant United States Attorney (LT), and with the consent of the defendant and defendant's counsel, respectfully move the Court to extend the time to indict this case through and including March 30, 2023. In support thereof, the United States states as follows:

1. The defendant was charged pursuant to a sealed criminal complaint with one count of transportation of child pornography in violation of Title 18 U.S.C. § 2252(a)(1). The defendant was arrested on or about January 31, 2023. On or about February 1, 2023, the defendant made his initial appearance in the Eastern District of Virginia. The court found probable cause that a crime was committed and ordered the defendant released on conditions pending trial. The government sought district court review, and the defendant was ordered detained on February 6, 2023.

2. The Speedy Trial Act requires that the defendant be indicted within thirty days of the defendant's arrest after subtracting all excludable time. A conservative estimate of the indictment deadline is March 2, 2023. The parties jointly request an extension of 28 days—to

and including March 30, 2023—for an extension of the time to indict. Extending this time period would be in the best interests of justice in that it would give the defendant time to meet with defense counsel, review discovery, and discuss possible resolutions of the case, including the possibility of a pre-indictment plea.

3. The defendant hereby agrees to waive any objections under the Speedy Trial Act and to extend the government's time to file an indictment in this case through and including March 30, 2023. The waiver is made knowingly, intentionally, and voluntarily by the defendant, and with full knowledge of the provisions of the Speedy Trial Act, Title 18, United States Code, Sections 3161, *et seq.*, and with the advice and consent of counsel.

4. The defendant expressly understands that his waiver is not predicated upon any promises, agreements, or understandings of any kind between the government and the defense in this case, and that nothing contained herein shall be construed to preclude the government from proceeding against the defendant during or after the time period covered by this waiver.

WHEREFORE, the United States requests that the time to indict this case be extended to and including March 30, 2023, and that the delay resulting from this extension be excluded in computing the time within which an indictment must be filed pursuant to Title 18, United States Code, Section 3161(h).

Respectfully submitted,

Jessica D. Aber  
United States Attorney

Date: February 17, 2023

By: /s/  
Zoe Bedell  
Assistant United States Attorney

Defendant's Signature: I hereby agree that I have consulted with my attorney and fully understand all my rights with respect to a speedy trial, including my right to be charged by indictment within 30 days of arrest, as required by Title 18, United States Code, Section 3161(b). I have read this motion for an extension of time to be charged by indictment, and carefully reviewed every part of it with my attorney. I understand this motion and voluntarily agree to it.

Date:

2/17/23

James Gordon Meek  
Defendant

Defense Counsel Signature: I am counsel for the defendant in this case. I have fully explained to the defendant the defendant's right to be charged by indictment within 30 days of arrest. Specifically, I have reviewed the terms and conditions of Title 18, United States Code, Section 3161(b), and I have fully explained to the defendant the provisions that may apply in this case. To my knowledge, the defendant's decision to agree to an extension of time to be charged by indictment is an informed and voluntary one.

Date:

2/17/23

Eugene Gorokhov  
Counsel for the Defendant